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IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MARYLAND  
(Greenbelt Division)

In re:

BARBARA ANN KELLY

Case No.: 23-12700-MCR  
Chapter 13

Debtor.

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**OPPOSITION TO MOTION FOR RELIEF FROM AUTOMATIC STAY AND CO-DEBTOR STAY AND IMPOSITION OF AN EQUITABLE SERVITUDE FOR TWO YEARS (4505 WETHERILL ROAD, BETHESDA, MD 20816)**

Respondent, Gregory B. Myers (“Mr. Myers” or “Respondent”), *pro se*, hereby opposes (the “Opposition”) the *Motion For Relief From Automatic Stay and Co-Debtor Stay And Imposition Of An Equitable Servitude For Two Years (4505 Wetherill Road, Bethesda, Md 20816)* [Doc. 66] (the “Stay Relief Motion”) filed by U.S. Bank NA, Successor Trustee to Bank of America, NA, Successor in Interest to Lasalle Bank NA, as Trustee, on Behalf of the Holders of the WAMU Mortgage Pass-Through Certificates, Series 2007-OA4 Trust (“U.S. Bank”). In support, Respondent states the following:

1. Respondent admits that a petition under Chapter 13 of the United States Bankruptcy Code was filed with respect to the Debtor, Barbara Ann Kelly, on April 19, 2023 (the “Petition”).
2. Any allegations citing law do not require a response. To the extent a response is required, the Debtor denies same.
3. Any document(s) referenced in the Lift Stay Motion speaks for itself.
4. Any allegations not expressly admitted are hereby denied.

5. Respondent requests that the Court schedule an evidentiary hearing and demands strict proof on the substance and merits of the Lift Stay Motion.

WHEREFORE, Respondent Myers respectfully requests that the Court entered an Order denying U.S. Bank's Lift Stay Motion [Doc. 66] and grant such other and further relief as the law requires.

Respectfully submitted,



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Gregory B. Myers, *pro se*  
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**PROOF OF SERVICE**

I hereby certify that on August 1, 2023, the foregoing OPPOSITION TO MOTION FOR RELIEF FROM AUTOMATIC STAY AND CO-DEBTOR STAY AND IMPOSITION OF AN EQUITABLE SERVITUDE FOR TWO YEARS (4505 WETHERILL ROAD, BETHESDA, MD 20816) was filed with the Clerk of the Bankruptcy Court and a copy of same was sent by first class mail, postage prepaid, to the following parties:

Barbara Ann Kelly  
700 Gulf Shore Blvd. N.  
Naples, Florida 34102

Rebecca A. Herr  
Chapter 13 Trustee  
185 Admiral Cochrane Dr., Ste. 240  
Annapolis, MD 21401-7623

Gregory Christopher Mullen, Esquire  
BWW Law Group, LLC  
6003 Executive Boulevard, Suite 101  
Rockville, Maryland 20852



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Gregory B. Myers, *pro se*